

Message

From: Crawford, Dorothy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B22442C0DAD249C1B798271CB981B12F-CRAWFORD, DOROTHY]
Sent: 3/19/2018 8:24:28 PM
To: Baca, Michael, NMENV [michael.baca1@state.nm.us]
CC: Bates, Rita, NMENV [Rita.Bates@state.nm.us]; Verhalen, Frances [verhalen.frances@epa.gov]; Intermont, Donna, NMENV [Donna.Intermont1@state.nm.us]; Singleton, Kerwin, NMENV [Kerwin.Singleton@state.nm.us]; judy.fisher@state.nm.us; mary.hilbert@state.nm.us
Subject: PM10 Exceedances, 2015-2017, Luna and Dona Ana Counties, NM
Attachments: NMED 2015 2017 PM10 Exceedances.xlsx

Mike, Attached is excel file I created with subject exceedances. I used various AQS reports to collect this data: Design Value and Actual and Estimated Exceedances, Daily Summary for 24-Hour averages, Raw Data to locate flags already entered by NMED). Would you please check me? Did I transfer info from AQS reports to excel file correctly? I am hoping this excel file can help us get on the same page about pending formal Initial Notifications. Thanks

During the Initial Notification process, we will coordinate the question of Regulatory Significance for each exceedance by monitor. The first tab of the excel file ('By Monitor') helps us as we evaluate whether the particular exceedance at the particular monitor currently has Regulatory Significance. Regulatory Significance based on PM10 Design Value occurs when the 3 year average Estimated Exceedances exceeds 1. It appears the 2015 thru 2017 PM10 exceedances at monitors in Luna and Dona Ana Counties may have current Regulatory Significance except for the 2016 and 2017 exceedances at 35-013-0024-81102-2. If there are 2018 exceedances at 35-013-0024-81102-2, the 2016 and 2017 exceedances may become Regulatory Significant.

Monitor	POC	2015		2016		2017	
		Actual Exceedances	Estimated Exceedances	Actual Exceedances	Estimated Exceedances	Actual Exceedances	Estimated Exceedances
35-013-0016	2	1	1	6	6	4	4.1
35-013-0019	2	0	0	1	1	2	2.1
35-013-0020	1	2	2	4	4		
35-013-0020	2			5	5.4	6	6
35-013-0021	1	3	4				
35-013-0021	2			8	8.3	8	8
35-013-0024	2			1	1	1	1
35-029-0003	2			3	3.1	5	5

If the exceedances have Regulatory Significance, then NMED will need to evaluate how to approach the development of the Exceptional Event Demonstrations. It would be great if the formal Initial Notifications reflected NMED's approach, that is how you plan to group them or present them. I hope the second tab ('By Day') in the excel file will help with this. A day – or series of days - with multiple exceedances at monitors in an area may be a candidate for combining the exceedances into one Demonstration.

There were a few anomalies on the 'By Monitor' tab. Can you help clarify these? Something I am not understanding about the data? NMED decide there was not enough technical support for flags?

Unclear why NMED selected to not flag the 35-013-0016-81102-2 and 35-013-0019-81102-2 measurements on 4/25/17.

Unclear why AQS indicated only 2 Actual Exceedances in 2017 for 35-013-0019-81102-2 while other info seems to show 3 Actual Exceedances.

Similar for 2016 data from 35-029-0003-81102-2, the AQS DV report shows 3 Actual Exceedances but other info seems to show 4 Actual Exceedances.

Unclear why NMED selected to not flag the 35-029-0003-81102-2 measurement on 3/12/16.

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From: Baca, Michael, NMENV [mailto:michael.baca1@state.nm.us]
Sent: Wednesday, March 14, 2018 12:58 PM
To: Crawford, Dorothy <Crawford.Dorothy@epa.gov>; Bates, Rita, NMENV <Rita.Bates@state.nm.us>; Verhalen, Frances <verhalen.frances@epa.gov>; Intermont, Donna, NMENV <Donna.Intermont1@state.nm.us>; Singleton, Kerwin, NMENV <Kerwin.Singleton@state.nm.us>; judy.fisher@state.nm.us; mary.hilbert@state.nm.us
Subject: NMED Exceptional Event Initial Notification Form

Good afternoon,

Please find a draft initial notification form and supporting data summary to be used to facilitate discussion about the process. I wanted to have feedback on these before proceeding with the rest of the dates for 2015 and 2016. I will speak to everyone shortly.

Thanks,

Mike
Michael Baca
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